

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 4:20-cv-00957-SDJ

DECLARATION OF CUSTODIAN OF RECORDS FOR THIRD-PARTY ADOBE

I, Greg Collison, declare as follows:

1. I am over the age of eighteen years and not a party to this matter.
2. I have never been convicted of a felony or a crime of moral turpitude.
3. I am located in San Francisco.
4. I am currently employed by Adobe Inc. ("Adobe"). I have been employed by Adobe since 2018. My current title is Head of Product, Adobe Advertising.
5. I understand that Adobe received a third-party subpoena ("the Subpoena") in this matter.
6. I understand that, as part of responding to the Subpoena, Adobe agreed to produce certain documents.
7. True and correct copies of Adobe documents were collected and produced in response to the Subpoena ("the Adobe Production").
8. Appendix A to this declaration identifies by Bates Number one document that was produced as part of the Adobe Production.

9. I am familiar with the one document identified in Appendix A and the manner in which it was made and maintained by Adobe.

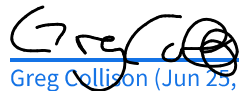
10. I am the duly authorized custodian of records for Adobe for the Document identified in Appendix A.

11. Adobe authorized me to make this declaration regarding the Document identified in Appendix A.

12. I certify that the Document identified in Appendix A is a true and correct copy of records that (i) were made at or near the time of the occurrence of the matters set forth herein; (ii) were made by, or from information transmitted by, a person with knowledge of those matters; (iii) were kept in the course of regularly conducted business activity for Adobe; (iv) were made by and in the course of the regularly conducted activity as a regular practice; and (v) are exact duplicates of the original records kept by Adobe.

13. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

14. This declaration was executed on June 25, 2025 in San Francisco, California.


Greg Collison (Jun 25, 2025 15:04 EDT)

Greg Collison
Head of Product, Adobe Advertising
Adobe Inc.

APPENDIX A

Bates Numbers:

ADOBE-TXAG-0000033071-33073

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 4:20-cv-00957-SDJ

DECLARATION OF CUSTODIAN OF RECORDS FOR THIRD-PARTY ADOBE

I, Greg Collison, declare as follows:

1. I am over the age of eighteen years and not a party to this matter.
2. I have never been convicted of a felony or a crime of moral turpitude.
3. I am located in San Francisco.
4. I am currently employed by Adobe Inc. ("Adobe"). I have been employed by Adobe since 2018. My current title is Head of Product, Adobe Advertising.
5. I understand that Adobe received a third-party subpoena ("the Subpoena") in this matter.
6. I understand that, as part of responding to the Subpoena, Adobe agreed to produce certain documents.
7. True and correct copies of Adobe documents were collected and produced in response to the Subpoena ("the Adobe Production").
8. Appendix A to this declaration identifies by Bates Number one document that was produced as part of the Adobe Production.

9. I am familiar with the one document identified in Appendix A and the manner in which it was made and maintained by Adobe.

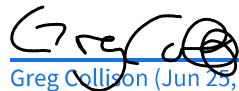
10. I am the duly authorized custodian of records for Adobe for the Document identified in Appendix A.

11. Adobe authorized me to make this declaration regarding the Document identified in Appendix A.

12. I certify that the Document identified in Appendix A is a true and correct copy of records that (i) were made at or near the time of the occurrence of the matters set forth herein; (ii) were made by, or from information transmitted by, a person with knowledge of those matters; (iii) were kept in the course of regularly conducted business activity for Adobe; (iv) were made by and in the course of the regularly conducted activity as a regular practice; and (v) are exact duplicates of the original records kept by Adobe.

13. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

14. This declaration was executed on June 25, 2025 in San Francisco, California.


Greg Collison (Jun 25, 2025 15:04 EDT)

Greg Collison
Head of Product, Adobe Advertising
Adobe Inc.

APPENDIX A

Bates Numbers:

ADOBE-TXAG-0000033071-33073

IN THE UNITED STATES DISTRICT COURT
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Civil Action No. 4:20-cv-00957-SDJ

DECLARATION OF CUSTODIAN OF RECORDS FOR THIRD-PARTY KEVEL

I, James Avery, declare as follows:

1. I am over the age of eighteen years and not a party to this matter.
2. I have never been convicted of a felony or a crime of moral turpitude.
3. I am currently employed by Adzerk, Inc. ("Kevel"). I have been employed by Kevel since approximately August 2009. My current title is Chief Executive Officer.
4. Kevel is located in Durham, North Carolina.
5. I understand that Kevel received a third-party subpoena ("the Subpoena") in this matter.
6. I understand that, as part of responding to the Subpoena, Kevel agreed to produce certain documents.
7. True and correct copies of Kevel documents were collected and produced in response to the Subpoena ("the Kevel Production").
8. Appendix A to this declaration identifies by Bates Number 2 documents that were produced as part of the Kevel Production.

9. I am familiar with the 2 documents identified in Appendix A and the manner in which they were made and maintained by Kevel.


10. I am the duly authorized custodian of records for Kevel for the Documents identified in Appendix A.

11. Kevel authorized me to make this declaration regarding the Documents identified in Appendix A.

12. I certify that the Documents identified in Appendix A are true and correct copies of records that (i) were made at or near the time of the occurrence of the matters set forth herein; (ii) were made by, or from information transmitted by, a person with knowledge of those matters; (iii) were kept in the course of regularly conducted business activity for Kevel; (iv) were made by and in the course of the regularly conducted activity as a regular practice; and (v) are exact duplicates of the original records kept by Kevel.

13. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

14. This declaration was executed on June 24, 2025, in Chapel Hill, North Carolina.



James Avery
Chief Executive Officer, Kevel

APPENDIX A

Bates Numbers:

KVL00000945

KVL00000989

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

THE STATE OF TEXAS, et al.

Plaintiffs,

vs.

GOOGLE LLC,

Defendants

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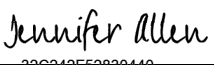
Civil Action No. 4:20-cv-00957-SDJ

**DECLARATION OF CUSTODIAN OF RECORDS FOR THIRD-PARTY META
PLATFORMS, INC.**

I, Jennifer Allen, declare as follows:

1. I am over the age of eighteen years and not a party to this matter.
2. I have never been convicted of a felony or a crime of moral turpitude.
3. I am located in Houston, Texas.
4. I am currently employed by Meta Platforms, Inc. ("Meta"). I have been employed by Meta since approximately January 19, 2021. My current title is Case Manager, eDiscovery & Information Governance.
5. I understand that the Plaintiffs in this matter issued a subpoena to Meta regarding a Rule 30(b)(6) deposition ("the Subpoena").
6. As part of responding to that Subpoena, Meta agreed to produce certain documents to the Plaintiffs.
7. True and correct copies of Meta documents were collected and produced to the Plaintiffs in response to the Subpoena ("the Meta Production").
8. The documents containing bates numbers listed in Appendix A to this declaration ("the Documents' Bates Numbers") identify 56 documents that were produced to the Plaintiffs as part of the Meta Production.
9. I am familiar with the 56 documents identified by the Documents' Bates Numbers in Appendix A ("the Documents") and the manner in which they were made and maintained by Meta.
10. I am the duly authorized custodian of records for Meta for those Documents.

11. Meta authorized me to make this declaration regarding those Documents.
12. I certify that the Documents are true and correct copies of records that (i) were made at or near the time of the occurrence of the matters set forth therein; (ii) were made by, or from information transmitted by, a person with knowledge of those matters; (iii) were kept in the course of regularly conducted business activity for Meta; (iv) were made by and in the course of the regularly conducted activity as a regular practice; and (v) and are exact duplicates of the original records kept by Meta.
13. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.
14. This declaration was executed on July 8, 2024 in Houston, Texas.

DocuSigned by:

320242F52030440...
Jennifer Allen

Appendix A

Bates Numbers:

1	FBTEX_01089475
2	FBTEX_01080688
3	FBTEX_00499181
4	FBTEX_00901497
5	FBTEX_01062704
6	FBTEX_01064247
7	FBTEX_01274568
8	FBTEX_00540345
9	FBTEX_01021169
10	FBTEX_00528526
11	FBTEX_00341876
12	FBTEX_00813671
13	FBTEX_00798052
14	FBTEX_00509695
15	FBTEX_01200160
16	FBTEX_01003825
17	FBTEX_00520976
18	FBTEX_00330274
19	FBTEX_00823374
20	FBTEX_00791336
21	FBTEX_01062706
22	FBTEX_01254367
23	FBTEX_01064318
24	FBTEX_00327634
25	FBTEX_00327693
26	FBTEX_00499187
27	FBTEX_00622033
28	FBTEX_00520976
29	FBTEX_00991403
30	FBTEX_01198286
31	FBDOJ012737419
32	FBDOJ013047835
33	FBDOJ012641326
34	FBDOJ012851003
35	FBDOJ012977432
36	FBDOJ012751485

37	FBDOJ012751299
38	FBDOJ012888357
39	FBDOJGOOG_00813706
40	FBDOJGOOG_01200005
41	FBDOJGOOG_00769400
42	FBDOJGOOG_00528988
43	FBDOJGOOG_00531068
44	FBDOJGOOG_00940917
45	FBDOJGOOG_00482531
46	FBDOJGOOG_00744539
47	FBDOJGOOG_00499187
48	FBDOJGOOG_01186933
49	FBDOJGOOG_01480889
50	FBDOJGOOG_00077461
51	FBDOJGOOG_00079180
52	FBDOJGOOG_00308181
53	FBDOJGOOG_00080936
54	METAGOOG00040481
55	METAGOOG00002407
56	FBDOJGOOG_01484801

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DECLARATION OF RICHARD FREDERKING

Pursuant to 28 U.S. Code § 1746 and Fed. R. Evid. 902(11). I, Richard Frederking, hereby declare and certify:

1. I am over 18 years of age. I am currently employed by Microsoft Corporation (“Microsoft”) as a Senior Paralegal in the litigation group within Microsoft Corporate, External, and Legal Affairs. I held the same position during the discovery period in the above captioned case, and in *United States, et al. v. Google LLC*, No. 1:23-cv-00108 (EDVA), the case for which Microsoft received third-party subpoenas (the “Subpoenas”) and a Rule 30(b)(6) deposition notice, pursuant to which Microsoft provided documents and deposition testimony reproduced in this case. By reason of my position, I am authorized and qualified to make this Declaration. I am familiar with the record keeping practices of Microsoft Corporation and, as the Senior Paralegal who oversaw Microsoft’s document collection, review, and production process in the EDVA case, I am also familiar with the documents produced in this litigation.

2. The records identified in Appendix A, which are subject to this certification, were produced by Microsoft in connection with the Subpoenas served on Microsoft, or the EDVA Plaintiffs' pre-litigation investigation, and reproduced to the parties in this matter.

3. I hereby certify that all records identified in Appendix A were made at or near the time indicated on the records—or in their accompanying metadata—by, or from information transmitted by, a person with knowledge of those matters. I further certify that these records were kept in the course of regularly conducted business activity and were made as a regular practice of that activity.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on the 20th of June, 2025, in Redmond, Washington.

6/20/2025

Richard Frederking

APPENDIX A

Beginning Bates
MSFT-LIT-0000000680
MSFT-LIT-0000046646
MSFT-LIT-0000065519
MSFT-LIT-0000072452
MSFT-LIT-0000080465
MSFT-LIT-0000080798
MSFT-LIT-0000081374
MSFT-LIT-0000081451
MICROSOFT_TR_00000728

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THE STATE OF TEXAS, et al.,

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Civil Action No. 4:20-cv-00957-SDJ

DECLARATION OF CUSTODIAN OF RECORDS FOR THIRD-PARTY NIKE

I, Carolyn Gutsick, declare as follows:

1. I am over the age of eighteen years and not a party to this matter.
2. I have never been convicted of a felony or a crime of moral turpitude.
3. I am located in Beaverton, Oregon.
4. I am currently employed by Nike, Inc. (“Nike”) in the position of Director, Litigation Paralegals, and by reason of my position am authorized and qualified to make this Declaration.
5. I understand that Nike received a third-party subpoena (“the Subpoena”) and Rule 30(b)(6) deposition notice in this matter.
6. I understand that, as part of responding to the Subpoena, Nike agreed to produce certain documents.
7. True and correct copies of Nike documents were collected and produced in response to the Subpoena (“the Nike Production”).

8. Appendix A to this declaration identifies by Bates Number 2 documents that were produced as part of the Nike Production.

9. I am familiar with the manner in which the two documents identified in Appendix A were made and maintained by virtue of my duties and responsibilities for Nike.

10. I am the duly authorized custodian of records for Nike for the Documents identified in Appendix A.

11. Nike authorized me to make this declaration regarding the Documents identified in Appendix A.

12. I certify that the Documents identified in Appendix A are true and correct copies of records that (i) were made at or near the time of the occurrence of the matters set forth herein; (ii) were made by, or from information transmitted by, a person with knowledge of those matters; (iii) were kept in the course of regularly conducted business activity for Nike; (iv) were made by and in the course of the regularly conducted activity as a regular practice; and (v) are exact duplicates of the original records kept by Nike.

13. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

14. This declaration was executed on the 23rd day of June, 2025, in Beaverton, Oregon.

DocuSigned by:

76F3712FC4134AA
Carolyn Gutsick

APPENDIX A

Bates Numbers:

NIKE0000059

NIKE0000547

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,

Plaintiffs,

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GOOGLE LLC,

Defendant.

Civil Action No. 4:20-cv-00957-SDJ

DECLARATION OF CUSTODIAN OF RECORDS FOR THIRD-PARTY SOVRN

I, Andrea Policky, declare as follows:

1. I am over the age of eighteen years and not a party to this matter.
2. I have never been convicted of a felony or a crime of moral turpitude.
3. I am located in Thornton, Colorado.
4. I am currently employed by Sovrn Holdings, Inc. ("Sovrn"). I have been employed by Sovrn since approximately September 2020. My current title is Senior Director of Legal Operations & Contracts.
5. I understand that Sovrn received a third-party subpoena ("the Subpoena") and Rule 30(b)(6) deposition notice in this matter.
6. I understand that, as part of responding to the Subpoena, Sovrn agreed to produce certain documents.
7. True and correct copies of Sovrn documents were collected and produced in response to the Subpoena ("the Sovrn Production").

8. Appendix A to this declaration identifies by Bates Number 2 documents that were produced as part of the Sovrn Production.

9. I am familiar with the 2 documents identified in Appendix A and the manner in which they were made and maintained by Sovrn.


10. I am the duly authorized custodian of records for Sovrn for the Documents identified in Appendix A.

11. Sovrn authorized me to make this declaration regarding the Documents identified in Appendix A.

12. I certify that the Documents identified in Appendix A are true and correct copies of records that (i) were made at or near the time of the occurrence of the matters set forth herein; (ii) were made by, or from information transmitted by, a person with knowledge of those matters; (iii) were kept in the course of regularly conducted business activity for Sovrn; (iv) were made by and in the course of the regularly conducted activity as a regular practice; and (v) are exact duplicates of the original records kept by Sovrn.

13. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

14. This declaration was executed on June 23, 2025 in Thornton, Colorado.

Signed by:

214EEA39849B4B5...

Andrea Policky

APPENDIX A

Bates Numbers:

SOVRN+000106

SVRN000001